

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-09700029-2021**
Application Received: **March 3, 2021**
Plant Identification Number: **03-54-097-00029**
Permittee: **Weyerhaeuser Company**
Facility Name: **Buckhannon Facility**
Mailing Address: **41 TJM Drive, Buckhannon, WV 26201**

Physical Location:	Buckhannon, Upshur County, West Virginia
UTM Coordinates:	568.00 km Easting • 4316.50 km Northing • Zone 17
Directions:	From Charleston, take Interstate 79 North to the Buckhannon Exit (Exit 99), proceed east on State Route 33 towards Buckhannon, for approximately 14 miles. After passing by Route 20 (Phillipi/Buckhannon) Exit, take the 2nd Exit on the left onto Industrial Park Road (Route 15/33). Continue on Industrial Park Road for approximately one (1) mile until coming to Stop sign. The plant is straight ahead.

Facility Description

Weyerhaeuser Company (Weyerhaeuser) is an engineered wood products facility covered by Standard Industrial Classification (SIC) Code 2493 and the North American Industry Classification System (NAICS) Code 321219. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week and fifty-two (52) weeks per year. The facility consists of one (1) wood-fired furnace, one (1) propane furnace, two (2) veneer dryers, three (3) wood presses, six (6) storage tanks of various sizes, six (6) baghouse systems, one (1) ESP, one (1) multiclone, and two (2) spray booths.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions
Carbon Monoxide (CO)	185.67	15.86
Nitrogen Oxides (NO _x)	208.05	66.46
Particulate Matter (PM _{2.5})	12.23	2.76
Particulate Matter (PM ₁₀)	59.22	13.16
Total Particulate Matter (TSP)	214.87	66.63
Sulfur Dioxide (SO ₂)	8.76	0.32
Volatile Organic Compounds (VOC)	234.4	106.39
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2020 Actual Emissions
Formaldehyde	6.79	2.68
Methanol	54.62	24.82
Phenol	0.37	0.17
Methylene Diisocyanate (MDI)	12.2	0.16

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 185.67 tpy of CO, 208.05 tpy of NO_x, 234.4 tpy of VOC, 54.62 tpy of Methanol, and 12.2 tpy of MDI. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Weyerhaeuser Company is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	To Prevent And Control Particulate Air Pollution from Combustion Of Fuel In Indirect Heat Exchangers.
	45CSR6	Open burning prohibited.
	45CSR7	To Prevent and Control Particulate Air Pollution from Manufacturing Process Operations
	45CSR10	To Prevent and Control Air Pollution from the Emissions of Sulfur Dioxides

	45CSR11	Standby plans for emergency episodes.
	45CSR13	NSR Permits.
	45CSR16	New Source Performance Standards
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants
	40 C.F.R. Part 60 Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
	40 C.F.R. Part 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63 Subpart DDDD	National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products
	40 C.F.R. Part 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR27	To Prevent and Control the Emissions of Toxic Air Pollutants.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1843C	November 25, 2015	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

This is the fourth renewal of this Title V permit. There have been no changes to the facility equipment since the issuance of the last Title V permit renewal in 2016.

Section 4.0 - Furnace Group 001[emission point ID(s): WoodFurn & StandByFurn]

- There has been no change to the applicable requirements of 45CSR2, 45CSR10, 45CSR13 (R13-1843C), 40 CFR 60 Subpart Db, 40 CFR 60 Subpart Dc and 40 CFR 63 Subpart DDDDD since the last renewal in 2016.

Section 5.0 - Source Specific Requirements [emission point ID(s): 003-01]

- There has been no change to the applicable requirements of 45CSR7 and 45CSR13 (R13-1843C) since the last renewal in 2016.

Section 6.0 - Source Specific Requirements [emission point ID(s): 004-01, 004-02, 004-03, 004-04, 004-05, 004-06, 004-07, 004-08, 005-01, 005-03, 005-04, 005-05, 005-06, 005-07, 005-08, 005-09]

- There has been no change to the applicable requirements of 45CSR7, 45CSR27, and 45CSR13 (R13-1843C) since the last renewal in 2016.

Section 7.0 - 40 C.F.R. 63 Subpart DDDD Requirements [emission point ID(s): 003-01, 004-01, 004-02, 004-03, 005-01, 005-04, 005-05, 005-06]

- 40 C.F.R. 63 Subpart DDDD was updated on August 13, 2020. This resulted in the following changes to the Title V permit:
 - Updated condition 7.1.1 to include the new row (6) of 40 C.F.R. Part 63 Subpart DDDD, Table 3.
 - Removed old condition 7.1.2. since 40 C.F.R. § 63.2250(a) does not apply after August 13, 2021.
 - Added new general requirements of 40 C.F.R. §§ 63.2250(e), (f), and (g) as conditions 7.1.2 - 7.1.4.
 - Updated condition 7.4.1.b with new requirements of 40 C.F.R. §63.2282(a)(2).
 - Added condition 7.4.2.c to include the requirements of Table 8 (row 6) of 40 C.F.R. 63 Subpart DDDD.
 - Added condition 7.4.3.d with new requirements of 40 C.F.R. §63.2283(d).
 - Updated condition 7.5.1. Old 7.5.1.a requirement (40 C.F.R. §63.2271(b)(2)) was removed since it was removed from 40 C.F.R. 63 subpart DDDD, old condition 7.5.1.b was renumbered to 7.5.1.a, and new requirement (40 C.F.R. §63.2271(b)(4)) was added as 7.5.1.b.
 - Updated condition 7.5.3 table to incorporate the August 13, 2020 changes to 40 C.F.R. 63 Subpart DDDD. Removed Table 9 Row (2) since it was only applicable before August 13, 2021 and added Table 9 Row (3). Table 9 Row (4) was not added since there is no CMS.
 - Updated condition 7.5.4 to include reference to 40 C.F.R. §63.2281(b)(6).
 - Updated condition 7.5.5.d to reflect changes in 40 C.F.R. §63.2281(c)(4).
 - Updated condition 7.5.6.b to reflect changes in 40 C.F.R. §63.2281(d)(2).
 - Added 40 C.F.R. §63.2281(h) reporting requirements as condition 7.5.7.

Stack Test Table

Tested Unit (Pollutant Test)	Test Years and Results Range	Testing Frequency at time of Renewal
WoodFurn (NO _x)	2005(50% - 90%), 2008(50% - 90%), 2010 (50% - 90%), 2011(50% - 90%), 2014(50% - 90%), 2015(50% - 90%), 2016(50% - 90%), 2019(50% - 90%)	Once/3 years
WoodFurn (PM, CO, VOC)	2005(≤50%), 2010(≤50%), 2015(≤50%), 2016(≤50%), 2019(≤50%)	Once/ 5 years.
StandByFurn1 (NO _x , VOC)	2005(≤50%), 2010(≤50%), 2015(≤50%), 2019(≤50%)	Once/ 5 years.

Tested Unit (Pollutant Test)	Test Years and Results Range	Testing Frequency at time of Renewal
VennerDryr (PM)	2005 (≤50%), 2010(≤50%), 2015(≤50%), 2019(≤50%)	Once/ 5 years.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

45CSR17	Weyerhaeuser Buckhannon Facility is subject to 45CSR7 which exempts it from 45CSR17, To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter, as stated in 45CSR§7-10.2.
45CSR21	Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds. Weyerhaeuser Buckhannon Facility is not located in Cabell, Kanawha, Putnam, Wayne, or Wood counties.
45CSR33	Acid Rain Provisions and Permits do not apply to Weyerhaeuser Buckhannon Facility because it is not considered a Title IV (Acid Rain) Source.
40 C.F.R. Part 60 Subpart EE	Standards of Performance for Surface Coating of Metal Furniture. Weyerhaeuser Buckhannon Facility is not engaged in any form of metal furniture surface coating.
40 C.F.R. Part 60 Subpart MM	Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations. Weyerhaeuser Buckhannon Facility is not engaged in the coating of automobiles or light-duty trucks.
40 C.F.R. Part 60 Subpart RR	Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations. Weyerhaeuser Buckhannon Facility does not operate a coating line used in the manufacture of pressure sensitive tape and label materials.
40 C.F.R. Part 60 Subpart SS	Standards of Performance for Industrial Surface Coating: Large Appliances. Weyerhaeuser Buckhannon Facility is not engaged in the coating of large appliances.
40 C.F.R. Part 60 Subpart TT	Standards of Performance for Metal Coil Surface Coating. Weyerhaeuser Buckhannon Facility is not engaged in metal coil surface coating.
40 C.F.R. Part 60 Subpart WW	Standards of Performance for the Beverage Can Surface Coating Industry. Buckhannon Facility is not engaged in beverage can surface coating.
40 C.F.R. Part 60 Subpart SSS	Standards of Performance for Magnetic Tape Coating Facilities. Buckhannon Facility is not engaged in coating continuous base film to produce magnetic tape.
40 C.F.R. Part 60 Subpart TTT	Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines. Weyerhaeuser Buckhannon Facility does not operate spray booths in which plastic parts for use in the manufacture of business machines receive prime coats, color coats, texture coats, or touch-up coats.
40 C.F.R. Part 63 Subpart H	National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks. Buckhannon Facility does not have a piece of equipment that either contains or contacts a fluid (liquid or gas) that is at least 5 percent by weight of total organic HAP's.
40 C.F.R. Part 63 Subpart JJ	National Emission Standards for Wood Furniture Manufacturing Operations. Weyerhaeuser Buckhannon Facility is not engaged in the manufacture of wood furniture or wood furniture components.
40 C.F.R. Part 63 Subpart KKKK	National Emission Standards for Surface Coating of Metal Cans. Weyerhaeuser Buckhannon Facility is not engaged in the manufacture of metal cans.

40 C.F.R. Part 63 Subpart MMMM	National Emission Standards for Surface Coating of Miscellaneous Metal Parts. Weyerhaeuser Buckhannon Facility is not engaged in the manufacture of miscellaneous metal parts.
40 C.F.R. Part 63 Subpart QQQQ	National Emission Standards for Surface Coating of Wood Building Products. Weyerhaeuser Buckhannon Facility is not engaged in the manufacture of wood building products.
40 C.F.R. Part 63 Subpart SSSS	National Emission Standards for Metal Coil (Surface Coating). Weyerhaeuser Buckhannon Facility is not engaged in the manufacture of metal coil product.
40 C.F.R. Part 64	CAM applies to any pollutant specific emissions units (PSEU) that satisfy all of the applicability criteria requirements of 40 C.F.R. § 64.2 (a), i.e., that: (1) have pre-control device regulated pollutant potential emissions (PTE) equal to or greater than the “major” threshold limits to be classified as a major source; (2) are subject to an emission limitation or standard and; (3) have a control device to achieve compliance with such emission limitation or standard. Since this facility does not have a PSEU that satisfies the requirements, it is not subject to the CAM rule.
40 C.F.R. Part 72	Acid Rain Program General Provisions does not apply to Weyerhaeuser because it is not considered a Title IV (Acid Rain) Source.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: October 23, 2021
Ending Date: November 22, 2021

Point of Contact

All written comments should be addressed to the following individual and office:

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41286
Robert.A.Mullins@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.